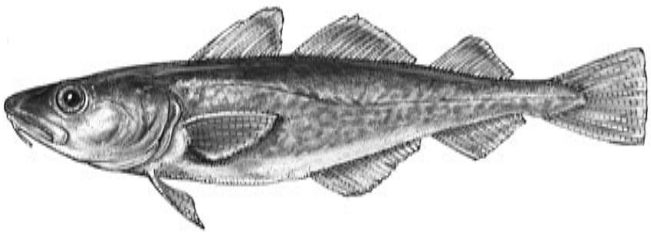
Common Mistakes in HACCP



Hazard Analysis

Disclaimer: This information supplements HACCP training, which is available through the Marine Advisory Program at www.uaf.edu/map/haccp.html. Regulations are occasionally changed and subject to interpretation by consumers and agencies.

#1 Not having a written hazard analysis

The federal regulation requires you to perform a hazard analysis but does not require a written document. The Alaska regulation requires a written document.

#2 Missing hazard analysis parts

There are three essential parts of the hazard analysis. The *product description* should include the species (using the Latin name will avoid confusion—the FDA "Fish List" of acceptable names is at www.cfsan.fda.gov/~frf/seaintro.html), form (i.e., frozen, cured, fresh), and the intended consumer. Then draw a *flow chart* based on different parts of the plant, individual machines, and the addition of anything that touches the product, including packaging material, ingredients, process water, ice, etc. A *narrative description* of the flow chart should include additional information. It is acceptable to combine products in one hazard analysis only if the hazards, critical control points, critical limits, and production methods are identical.

#3 Too many or too few critical control points

The two common mistakes when performing a hazard analysis on your product both arise from ignoring your Hazards Guide (www.cfsan.fda.gov/~comm/haccp4.html). You may have many monitoring points in your product flow where the information may or may not be recorded, but these should not be defined as critical control points. Go through the Hazards Guide and note which hazards are associated with your product in both the species list and the product form list; then address those. In every product form metal inclusion and allergens are listed as potential hazards. Your hazard analysis should mention both of these, even if to explain why they are not likely to occur.

#4 Combining different processes of the same species in the same hazard analysis

It is permissible to combine products in the same hazard analysis if the hazards and control methods are identical. However, you will want a combination like this only if the process is similar enough to be entered in the same flow chart. For instance, cod fillets and headed and gutted cod are processed in the same fashion with one step added for fillets, while salmon fillets and salmon roe are processed very differently.

#5 Not updating your hazard analysis

The regulation requires you to reassess your hazard analysis after any substantial change to your plant or process such as new equipment or a new recipe. If you have a HACCP plan you are required to reassess it every year and after substantial changes.

#6 Not signing the document

If you have a HACCP plan it must be signed and dated by someone with authority to represent the firm, which is generally the plant manager or somebody higher in the corporate structure. The signature and date will show that the plan has been reassessed annually as required.

#7 Not reviewing and signing the records

If you have a HACCP plan the records must be reviewed and signed within a week by a HACCP trained (or equivalently knowledgeable) person. You should review the records more promptly, however, because if there is a problem you want to discover it as soon as possible.

Liz Brown
Marine Advisory Agent
P.O. Box 1549
Dillingham, Alaska 99576
(907) 842-1265
Fax (907) 842-3202
bfeab@uaf.edu

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ASG-38 May 2006

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